



Kelly T. Currie
KCurrie@crowell.com
(212) 895-4257 direct

Crowell & Moring LLP
590 Madison Avenue
20th Floor
New York, NY 10022
+1.212.223.4000 main
+1.212.223.4134 fax

November 17, 2022

Application Granted. All other conditions of bail shall remain in effect. The Clerk of the Court is directed to terminate the letter motion at docket number 46.

By ECF

Dated: November 17, 2022
New York, New York

The Honorable Lorna G. Schofield
United States District Court Southern District of New York
500 Pearl Street New York, New York 10007

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: United States v. Ali Cheema; Criminal Docket No: 22 Cr. 615 (LGS)

Dear Judge Schofield:

We represent the defendant Ali Cheema in the above referenced matter. We write to renew our request that the conditions of Mr. Cheema's release be modified to allow him to travel to Stanford, Connecticut on November 17, 2022, and as necessary in the future, in order for him to perform his work obligations. Please note that this request is time-sensitive.

The prosecutor assigned to Mr. Cheema's case, Assistant United States Attorney Timothy Capozzi, notified us via email on November 14, 2022 that the Government does not have any objections to this request. Additionally, Supervisory U.S. Pretrial Services Officer Josh Rothman notified us via email on November 16, 2022 that the Pretrial Services Office also does not object to this request.

As noted in our original request, at his presentment in the instant case on September 21, 2022, Magistrate Judge Figueredo ordered Mr. Cheema's release on a \$250,000 bond, secured by a financially responsible cosigner. Mr. Cheema's bond conditions currently permit him to travel within the Southern, Eastern, and Northern Districts of New York.

Mr. Cheema works as a Site Supervisor for ACS Construction. As a Site Supervisor, Mr. Cheema is responsible for traveling to, and being physically present at, the construction site which he is assigned to supervise on a particular day. On November 14, 2022, Mr. Cheema's employer assigned him to begin working on a transit project in Stanford, Connecticut beginning on November 15, 2022, and extending into the foreseeable future. Mr. Cheema requests that he be allowed to travel to the construction site in Stanford, CT,¹ as necessary to fulfill his work

¹ The exact address has been provided to Pretrial Services.



obligations. Mr. Cheema commits to returning home to his wife and family in the Eastern District of New York each night following the conclusion of each workday.

Mr. Cheema is not able to select which construction sites he will be assigned to work at on a particular day for ACS construction, and must be physically present at whichever site he is assigned in order to fulfill his responsibilities as a Site Supervisor. Thus, the ability to travel to Stanford, Connecticut to be present at his assigned construction site is essential to Mr. Cheema's ability to continue his employment at ACS Construction. In turn, Mr. Cheema's ability to continue working for ACS Construction while he is released on bond is essential to his ability to continue to support himself and his family during the pendency of his case.

Since his release on bond, Mr. Cheema has complied with all of the conditions of his release and has been in regular contact with Pretrial Services, as required. Mr. Cheema will not have contact with any of his co-defendants as a result of this proposed bail modification, as none of his co-defendants work for ACS Construction, or will be present at the construction site in Connecticut.

Please let us know if you have any questions, or require any documentation in order to evaluate Mr. Cheema's request. Thank you for your consideration of this urgent request.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Kelly T. Currie'.

Kelly T. Currie

Cc: AUSA Timothy Capozzi (by email)
Pretrial Services Officer Meherun Mayer (by email)
Supervisory U.S. Pretrial Services Officer Josh Rothman (by email)